

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

BERNADETTE HIGHTOWER, LATERSHIA  
JONES, GEORGE DEAN, and BRUCE MARK  
WOODRUFF, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

RECEIVABLES PERFORMANCE  
MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO ANSWER AMENDED  
CONSOLIDATED CLASS ACTION  
COMPLAINT AND TO SUBMIT INITIAL  
DISCLOSURES AND JOINT STATUS  
REPORT AND CASE MANAGEMENT  
PLAN**

**NOTE ON MOTION CALENDAR:  
January 26, 2024**

**I. STIPULATION**

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint and for

1 an extension of time to submit Initial Disclosures and Joint Status Report and Discovery Plan,  
2 and in support thereof, state as follows:

3 1. Plaintiffs filed their Amended Consolidated Class Action Complaint on May 4,  
4 2023. ECF No. 42.

5 2. Defendant's current due date for responding to Plaintiffs' Consolidated Class  
6 Action Complaint is January 27, 2024. ECF No. 53.

7 3. Additionally, the Court has set the following deadlines for initial disclosures and  
8 submission of the Joint Status Report and Discovery Plan: 1) Deadline for FRCP 26(f)  
9 Conference: February 1, 2024; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): February 8,  
10 2024; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f)  
11 and Local Civil Rule 26(f): February 15, 2024. ECF No. 53.

12 4. As set forth in the Parties' motion to amend complaint and for an extension of  
13 time for Defendant to respond to the Amended Consolidated Class Action Complaint (ECF  
14 No. 52), the Parties agreed to discuss the possibility of an early resolution, including the  
15 exchange of information to allow the Parties to evaluate the strengths and weaknesses of  
16 Plaintiffs' claims and Defendant's defenses, as well as the scheduling of a mediation before  
17 Hon. Wayne Andersen (Ret.). This mediation was conducted on July 12, 2023. ECF No. 45.

18 5. The Parties continue to discuss early resolution of this matter with the assistance  
19 of Hon. Wayne Anderson (Ret.). Following the last mediation session, the Parties exchanged  
20 significant documentation to assist in the potential early resolution of this matter, and the  
21 Parties continue to exchange further documentation following the initial exchange to assist in  
22 the potential early resolution of this matter. Mediator Hon. Wayne Andersen (Ret.) continues  
23 to be involved and continues to facilitate the Parties' efforts to resolve the matter, and the  
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1 Parties are considering whether a further mediation session with Hon. Andersen is warranted  
2 to assist the parties in achieving a resolution of this matter.

3 6. In light of the above, the Parties stipulate and agree that good cause exists for an  
4 extension as stipulated herein and that it would be beneficial to further extend the time for  
5 Defendant to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended  
6 Complaint.

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8 7. As such, in light of the above and subject to Court approval, the Parties stipulate  
9 and agree that Defendant shall have an extension of time up to and including March 29, 2024  
10 to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action  
11 Complaint.

12 8. Moreover, the Parties stipulate and agree, subject to Court approval, that the  
13 deadlines for initial disclosures and submission of the Joint status Report and Discovery Plan  
14 be extended as follows: (1) Deadline for FRCP 26(f) Conference: April 5, 2024; (2) Initial  
15 Disclosures Pursuant to FRCP 26(a)(1): April 12, 2024; and (3) Combined Joint Status  
16 Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): April 19,  
17 2024.  
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19 WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that  
20 Defendant be granted an extension as stipulated and agreed herein.

21 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 26<sup>th</sup> day of January,  
22 2024.  
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**ORDER**

It is so ORDERED:

Defendant shall answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action Complaint on or before March 29, 2024.

The deadlines for initial disclosures and submission of the Joint Status Report and Discovery Plan per ECF No. 51 are extended as follows: (1) Deadline for FRCP 26(f) Conference: April 5, 2024; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): April 12, 2024; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and Local Civil Rule 26(f): April 19, 2024.

DATED this 29<sup>th</sup> day of January, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE